

MEMO ENDORSED



Handley Farah & Anderson PLLC

October 14, 2021

Via ECF

United States District Judge Sidney H. Stein
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Housing Rights Initiative v. Compass, Inc. et al., Case No. 21-cv-2221

Dear Judge Stein:

We represent Plaintiff Housing Rights Initiative in the above-referenced matter. I write to request a final extension of time to November 22, 2021 for all Defendants to respond to the complaint. Although Plaintiff has received requests from some Defendants in this action to consent to the requested relief in this motion, Plaintiff—rather than Defendants—make this request so as not to burden the Court with numerous extension requests from Defendants, and to try to align the response date for the Defendants who have not yet answered the complaint for a single date prior to the December 1 scheduling conference.

On March 15, 2021, the Complaint in this civil action was filed, naming eight-eight (88) entities as Defendants. All Defendants have been served. On May 14, 2021, the Court extended the deadline for all defendants to answer or move in response to the Complaint to August 20, 2021. Dkt. No. 109. On June 14, 2021, the Court set an initial conference for September 14, 2021. Dkt. No. 134. On August 16, 2021, the Court granted Plaintiff's request to extend the deadline for defendants to respond or otherwise move to September 20, 2021 and rescheduled the initial conference to October 15, 2021. Dkt. No. 154. On September 17, 2021, after receiving requests from several defendants, the Court extended the date for all defendants to answer or otherwise respond to the Complaint to October 20, 2021. Dkt. No. 198. On October 8, 2021, the Court granted Plaintiff's request to adjourn the Status Conference, which is now set for December 1, 2021.

Plaintiff believes a final extension of the deadline to answer or otherwise respond to the Complaint to November 22, 2021 will allow all Defendants who desire additional time to have sufficient time to respond to the Complaint. This will also allow Plaintiff to continue to resolve

its claims with some Defendants. Additionally, this will not impact the currently scheduled status conference on December 1, 2021. Plaintiff does not intend to seek any additional extensions of time related to the deadline to respond or otherwise move.

Plaintiff has reached out to all counsel that have appeared regarding the request to extend the deadline to answer or otherwise respond to the Complaint.

Counsel for the following Defendants have stated they consent to the request:

- Tenth Manhattan Corp.
- FirstService Realty NYC, Inc.
- Bold LLC
- Paley Management Corp.
- Jan Reynolds Real Estate
- Prospect Owners Corp.
- PD Properties LLC
- Saldo Properties, LLC
- Maz Group NY LLC
- Eric Goodman Realty Corp.
- Jackson Ht. Roosevelt Development II, LLC
- Rosa Magiafridda
- 165 Hester
- Corcoran Group LLC
- Home By Choice LLC
- Lande Realty 2010, LLC
- John O'Kelly Real Estate, Inc.
- Alexander Hidalgo Real Estate, LLC.
- East 89th Street Associates, LLC
- 83rd Street Associates LLC
- The Stratford LLC
- Atias Enterprises Inc.
- Park Row (1st Ave) Ltd
- 348 East 62nd LLC
- Lions Gate New York LLC
- 41-42 Owners Corp
- Urban Real Estate Property Group
- Eva Management LLC
- 165th St. Realty, LLC
- MTY Group, Inc.
- M Q Realty LLC
- Wegro
- 931-955 Coney Island Ave, LLC
- Compass, Inc.

Counsel for the following Defendants have stated they do not oppose the request:

- GIM Realty LLC

Plaintiff's counsel has not received a position from the following Defendants:

- E Realty International Corp.
- Peter Chris Meskouris
- Hell's Kitchen, Inc.
- Myerowitz/Satz Realty Corp.
- Voro LLC
- 3Localtion3.Co Realty, LLC
- Chandler Management, LLC
- Famgroup
- 1380 First Owners Co., L.P.

No Defendant has informed Plaintiff of an objection to this request.

Plaintiff therefore respectfully requests that the deadline for all Defendants to respond or otherwise move in response to the complaint be moved from October 20, 2021 to November 22, 2021.

Thank you for your consideration.

Respectfully,

/s/ Matthew Handley

Matthew Handley

cc: All counsel of record (via ECF)

The last day for all defendants to respond to the complaint is extended to November 22, 2021.

Dated: New York, New York
October 14, 2021

SO ORDERED:



Sidney H. Stein, U.S.D.J.